



August 31, 2011

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization; CC Docket No. 96-45, Federal-State Joint Board on Universal Service; WC Docket No. 03-109, Lifeline and Link Up

Dear Ms. Dortch:

On August 31, 2011, Dale Schmick, Chief Strategy Officer, YourTel America, Inc. and Chairman of the Board of COMPTel, and the undersigned met with Kim Scardino and Jamie Susskind of the Wireline Competition Bureau regarding the above-captioned Lifeline/Link Up reform proceedings. Geoffrey Blackwell of the Office of Native Affairs and Policy and Irene Flannery of the Wireline Competition Bureau participated in the meeting via telephone. Mr. Schmick discussed the challenges ETCs face in identifying customer addresses on tribal lands and how those challenges vary depending on whether the area is served by a non rural incumbent LEC or a rural incumbent LEC. He also cited the difficulties carriers encounter in the application process for ETC designation on tribal lands.

COMPTel stressed the importance of maintaining Link Up reimbursement for service activation fees charged by both wireline and wireless carriers. Such service activation fees cover the administrative costs of opening a new account for a customer and are standard in both the wireline and wireless industries for non-Lifeline as well as Lifeline customers. If Link Up reimbursement is eliminated, low income consumers will be forced to pay 100% of the non-recurring charges associated with establishing a new account, which is likely to create a barrier to telephone subscribership. We briefly addressed the advantages of a one-per-qualifying adult rule over a one-per-residential address rule consistent with the written submissions COMPTel made in these dockets on April 21, May 10, August 26, 2011.

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If you have any questions or need additional information, kindly contact the undersigned.

Respectfully submitted,

/s/

Mary C. Albert

cc: Kim Scardino
Jamie Susskind
Geoffrey Blackwell
Irene Flannery